

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

EXPERIMENTAL PRIORITY MAIL FLAT-RATE
BOX, 2004

Docket No. MC2004-2

MOTION OF THE UNITED STATES POSTAL SERVICE TO PLACE
DIRECT TESTIMONY AND WRITTEN CROSS-EXAMINATION
INTO THE EVIDENTIARY RECORD
(September 8, 2004)

In accordance with the Presiding Officer's directive,¹ the United States Postal Service hereby moves that all direct testimony and designated written cross-examination be made part of the evidentiary record in this docket.

The direct testimony consists of:

- 1) Testimony of Thomas M. Scherer on Behalf of the United States Postal Service, USPS-T-1. Witness Scherer also sponsors his Category 2 library reference, USPS-LR-1, *Supporting Materials for Witness Scherer, USPS-T-1*,²
- 2) Testimony of Daniel J. Barrett on Behalf of the United States Postal Service, USPS-T-2, as corrected on August 2, 2004; and
- 3) Testimony of L. Paul Loetscher on Behalf of the United States Postal Service, USPS-T-3. Witness Loetscher also sponsors his Category 2 library reference, USPS-LR-2, *Priority Mail Parcel Size Distribution and Density Study, Supporting Materials of Witness Loetscher, USPS-T-3*, as corrected on July 8, 2004.

Only one participant, the Commission's Office of the Consumer Advocate (OCA), designated written cross-examination for inclusion in the evidentiary record as specified

¹ Presiding Officer's Ruling Establishing Final Procedural Schedule, Presiding Officer's Ruling No. MC2004-2/7 (August 31, 2004)(hereinafter "POR 7").

² Per standard practice at the Postal Rate Commission, witnesses' foundational materials appearing in Category 2 library references are sponsored by witnesses, but not physically included in transcripts.

by POR 7. The OCA separately designated responses for each witness and for institutional responses.³

Furnished to the Commission contemporaneously with the filing of this pleading are two hard copy original declarations from each witness attesting to the authenticity, accuracy and admissibility of written direct testimony and written responses previously provided by respective witnesses. An unsigned example of each is also appended to this pleading.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Kenneth N. Hollies

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September 8, 2004

³ POR 7, at 3, also provided the Postal Service an opportunity to include in the instant Motion "any Postal Service designated written counter-cross-examination into the record." The OCA's comprehensive designations obviate the exercise of this option.

**POSTAL RATE COMMISSION
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EXPERIMENTAL PRIORITY MAIL FLAT RATE BOX, 2004**

I, Thomas M. Scherer, hereby declare under penalty of perjury that:

The *Testimony of Thomas M. Scherer On Behalf Of The United States Postal Service*, denominated USPS-T-1, was prepared by me or under my direction;

Were I to give this testimony orally before the Commission, it would be the same;

The interrogatory responses filed under my name, and designated for inclusion in the record of this docket, were prepared by me or under my direction; and

Were I to respond orally to the questions appearing in the interrogatories, my answers would be the same.

Thomas M. Scherer

Date

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I, Daniel J. Barrett, hereby declare under penalty of perjury that:

The *Testimony of Daniel J. Barrett On Behalf Of The United States Postal Service*, denominated USPS-T-2, was prepared by me or under my direction;

Were I to give this testimony orally before the Commission, it would be the same;

The interrogatory responses filed under my name, and designated for inclusion in the record of this docket, were prepared by me or under my direction; and

Were I to respond orally to the questions appearing in the interrogatories, my answers would be the same.

Daniel J. Barrett

Date

**POSTAL RATE COMMISSION
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I, L. Paul Loetscher, hereby declare under penalty of perjury that:

The *Testimony of L. Paul Loetscher On Behalf Of The United States Postal Service*, denominated USPS-T-3, was prepared by me or under my direction;

Were I to give this testimony orally before the Commission, it would be the same;

The interrogatory responses filed under my name, and designated for inclusion in the record of this docket, were prepared by me or under my direction; and

Were I to respond orally to the questions appearing in the interrogatories, my answers would be the same.

L. Paul Loetscher

Date